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**SOAH DOCKET NO. 473-25-07888
PUC DOCKET NO. 55656**

APPLICATION OF THE CITY OF MCKINNEY TO DECERTIFY A PORTION OF ITS CERTIFICATES OF CONVENIENCE AND NECESSITY IN COLLIN COUNTY	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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CITY OF MCKINNEY'S TRCP 194 INITIAL DISCLOSURES

Pursuant to Order No. 4 and Rule 194 and other applicable provisions of the Texas Rules of Civil Procedure, Applicant, The City of McKinney, hereby serves this, its TRCP 194 Initial Disclosures.

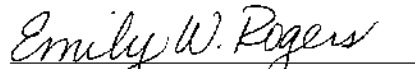
Respectfully submitted,

Emily W. Rogers
State Bar No. 24002863
erogers@bickerstaff.com

Stefanie P. Albright
State Bar No. 24064801
salbright@bickerstaff.com

Bickerstaff Heath Delgado Acosta LLP
Two Barton Skyway
1601 S. MoPac Expy., Ste. C400
Austin, TX 78746
Telephone: (512) 472-8021
Facsimile: (512) 320-5638

BY:



Emily W. Rogers

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on all parties of record on April 28, 2025, in accordance with the requirements of 16 Tex. Admin. Code § 22.74 and PUC Order No. 2 in Docket No. 50664.



Emily W. Rogers

RESPONSES TO REQUEST FOR INITIAL DISCLOSURES

- b-1. The correct names of the parties to the lawsuit.

RESPONSE:

The parties listed in Order No. 2, as modified by Order Nos. 6 and 7, are the parties in these cases.

- b-2. The name, address, and telephone number of any potential parties.

RESPONSE:

Other than the parties named in Order No. 2, as modified by Order Nos. 6 and 7, The City does not know of any other potential parties.

- b-3. The legal theories and, in general, the factual bases of the claims or defenses of the responding party.

RESPONSE:

The City's Application to decertify portions of its water and wastewater certificates of convenience and necessity should be granted because the City has never provided, is no longer providing, is incapable of providing, or has failed to provide continuous and adequate service to the requested area. The City has no existing customers in the requested area, and its facilities serve only existing customers. The City is not discontinuing service to any existing customers. The City has also consented in writing to the decertification. The decertification will not adversely affect the City, any existing customers, or any landowner in the decertified area. There are feasible alternatives to obtaining service from the City, including service from neighboring utilities or the creation of a new utility. Maintaining the CCNs in the requested areas will negatively impact the City for the reasons stated in the City's Application. The future and present convenience and necessity will not be adversely affected. The City's Application complies with the requirements of Texas Water Code Chapter 13 and the PUC rules.

See also the City's Application filed on October 9, 2023 with the Public Utility Commission of Texas, the City's List of Issues filed with the PUC on November 11, 2024, and the City's TRCP 195 Expert Disclosures.

- b-4. The amount and any method of calculating economic damages.

RESPONSE:

Economic damages are not an available remedy and therefore not an issue in this

proceeding.

- b-5. The name, address and telephone number of any and all persons having knowledge of any relevant facts, and a brief statement of each identified person's connection with this cause.

RESPONSE:

In addition to the parties and their legal representatives, the following persons have or may have knowledge of relevant facts in connection with this case. The City reserves the right to supplement this list in accordance with the procedural schedule in Order No. 4:

The following people work for the City and have been actively involved with the development of the Application and have knowledge of the City's water and wastewater systems, City ordinances, development requirements, the City's water and wastewater master plans.

Paul Grimes
City Manager

Jennifer Arnold
Assistant City Manager

Trevor Minyard
Assistant City Manager

Barry Shelton
Assistant City Manager

Mark Houser
City Attorney

Michael Quint
Executive Director of Development Services

Ryan Gillingham, P.E.
Director of Public Works

Gary Graham, P.E.
Director of Engineering

City of McKinney
401 E. Virginia St.
McKinney, TX 75069
972-547-4000

The City Council of the City of McKinney may have knowledge the Application and the purpose of the Application.

George Fuller, Mayor
Geré Feltus, Mayor Pro Tem
Justin Beller
Patrick Cloutier
Rick Franklin
Charlie Philips
Michael Jones

City of McKinney
401 E. Virginia St.
McKinney, TX 75069
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Attorneys Representing the City:

Emily W. Rogers
Stefanie P. Albright
Bickerstaff Heath Delgado Acosta LLP
1601 S. MoPac Expressway
Suite C400
Austin, TX 78746
(512) 472-8021

- b-6. a copy or description by category and location of all documents, electronically stored information, and tangible things that the responding party has in its possession, custody, or control, and may use to support its claims or defenses.

RESPONSE:

The City's Application is available on the PUC Interchange. As the City develops its case and conducts discovery, the City will gather documents to support the City's legal theories in this case. The City will supplement its response to this disclosure as needed.

- b-7. Any indemnity and insuring agreements.

RESPONSE:

To The City's knowledge, there are no agreements.

- b-8. Any settlement agreements.

RESPONSE:

To The City's knowledge, there are no agreements.

- b-9. Any witness statements.

RESPONSE:

There are no witness statements.

- b-10. In a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills that are reasonably related to the injuries or damages asserted or, in lieu thereof, an authorization permitting the disclosure of such medical records and bills.

RESPONSE:

Not applicable.

- b-11. In a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills obtained by the responding party by virtue of an authorization furnished by the requesting party.

RESPONSE:

Not applicable.

- b-12. The name, address, and telephone number of any person who may be designated as a responsible third party.

RESPONSE:

There are no responsible third parties.

The City reserves the right to supplement or amend these disclosure responses if additional information is obtained hereafter.